

THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

GEOVANNY FUENTAS RAMIREZ,

Defendants.

15 Cr. 379 (PKC)

EX PARTE¹ MOTION FOR APPROVAL TO FILE UNDER SEAL

NOW COMES Geovanny Fuentes Ramirez, by and through his attorney, Avraham C. Moskowitz, and respectfully moves, *ex parte*, for approval from the Court to file under seal a letter on behalf of defendant, requesting the use of an Associate.

WHEREFORE counsel respectfully request that the relief sought be granted.

On this 10th day of February 2022, it is

Respectfully submitted,
MOSKOWITZ & BOOK, LLP

By: /s/Avraham C. Moskowitz

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Counsel to Defendant Geovanny Fuentes Ramirez

Dated: New York, New York
February 10, 2022

¹This application is filed *ex parte* and under seal pursuant to LCrR 12.2 because it concerns information related to defense strategy that should not be made available to the other parties to this litigation. See Administrative Office of the United States Courts, GUIDELINES FOR THE ADMINISTRATION OF THE CRIMINAL JUSTICE ACT, Section 640.20.